

**Appl. No. 09/998,513**  
**Amdt. dated August 19, 2005**  
**Reply to Office action of May 20, 2005**

### **REMARKS/ARGUMENTS**

Applicant has received the Office Action dated May 20, 2005, in which the Examiner: 1) rejected claims 1-16 under 35 U.S.C. § 101; 2) rejected claims 1-3, 8-12, 17, 18 and 23-25 under 35 U.S.C. § 103(a) as being unpatentable over Parker (U.S. Pat. No. 6,366,930) in view of Kakumani (U.S. Pat. No. 6,681,382); 3) rejected claims 4, 13, 19 and 26 under 35 U.S.C. § 103(a) as being unpatentable over Parker in view of Kakumani and further in view of Wescott (U.S. Pat. No. 6,223,323); and 4) rejected claims 5-7, 14-16, 20-22 and 27-29 under 35 U.S.C. § 103(a) as being unpatentable over Parker in view of Kakumani and further in view of Lash (U.S. Pub. No. 2002/0188665). With this Response, Applicant amends claims 2, 10, and 17, cancels claims 8, 9, 23, and 24, and submits new claims 30-33. Based on the amendments and arguments contained herein, Applicant believes all claims are in condition for allowance.

While Applicant does not necessarily agree with the Examiner's § 101 rejections, Applicant's newly submitted claim 30 should satisfy the Examiner in this regard. Further, claim 10 has been amended to address the § 101 issue as well.

Newly submitted independent claim 30 requires a processor modifying a first file to create a second file and modifying the second file to create a third file. The claim also requires "creating a transformation operator that identifies changes between the first and third files." Applicant does not find any disclosure within the art of record of creating a transformation operator that identifies changes between two files in which one file was not modified directly from the other file. For at least this reason, claim 30 and all claims dependent thereon are not anticipated by, nor obvious over, the art of record.

Claim 10 has been amended to recite a processor "retrieving a transformation operator that is indicative of differences between a current version of the file and the file in existence at least two versions ago" and "applying said transformation operator to the current file version in order to generate the file as it existed at least said two versions ago, without generating any interim version of said file." Applicant finds no teaching or suggestion of this combination of

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limitations in the art of record. For at least this reason, claim 10 and all claims dependent thereon are allowable over the art of record.

Amended claim 17 requires "a transformation operator which is indicative of the differences between a first version of a file and a subsequent version of the file, the transformation operator having been generated when the newer version of the file was saved, and wherein other versions of said file existed between said first version and said subsequent version." Applicant does not find any teaching or suggestion of such a transformation operator in the art of record. For at least this reason, claim 17 and all claims dependent thereon are allowable over the art of record.

The limitation regarding recovering the first version of the file has been removed from claim 17 as being unnecessary to patentability, but has been included as newly added dependent claim 33.

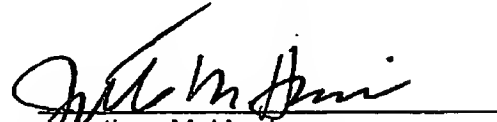
Claim 25 has not been amended. Claim 25 requires a "first transformation operator" and a "second transformation operator." The first transformation operator is "indicative of the differences between the first version and the third version" of a file, with a "second version" being a version between the first and third versions. The art of record does not teach or suggest this type of transformation operator. The art of record also does not teach or suggest using both the first and second transformation operators as claimed. For either or both of these reasons, Applicant believes claim 25 and all claims dependent thereon to be patentable over the art of record.

Applicant respectfully requests reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including

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fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,



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